

FINAL DRAFT/PROPOSED CAAPP RENEWAL PERMIT
Lakewood Engineering and Manufacturing Co.
I.D. No.: 031600BRJ
Application No.: 95110086
January 15, 2004

217/782-2113

RENEWAL
TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT¹

PERMITTEE

Lakewood Engineering & Manufacturing Co
Attn: John Sharkey
501 North Sacramento Boulevard
Chicago, Illinois 60612

<u>Application No.:</u> 95110086	<u>I.D. No.:</u> 031600BRJ
<u>Applicant's Designation:</u>	<u>Date Received:</u> November 27, 1995
<u>Operation of:</u> Fans, Radiators and Tree Stands Manufacturing and Coating	
<u>Date Issued:</u> TO BE DETERMINED	<u>Expiration Date</u> ² : TO BE DETERMINED
<u>Source Location:</u> 501 North Sacramento Boulevard, Chicago, Cook, 60612	
<u>Responsible Official:</u> John Sharkey, Purchasing Manager	

This permit is hereby granted to the above-designated Permittee to OPERATE a fans, radiators and tree stands manufacturing and coating operation, pursuant to the above-referenced permit application. This permit is subject to the conditions contained herein.

If you have any questions concerning this permit, please contact Jonathan Sperry at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:JS:psj

cc: Illinois EPA, FOS Region #1
CES
Lotus Notes

¹ This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the Clean Air Act and regulations promulgated thereunder, including 40 CFR 52.21 - federal Prevention of Significant Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within the permit.

² Except as provided in condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Lakewood Engineering & Manufacturing Co
501 North Sacramento Boulevard
Chicago, Illinois 60612
773/722-4300

I.D. No.: 031600BRJ
Standard Industrial Classification: 3564, Blowers and Fans

1.2 Owner/Parent Company

Lakewood Engineering & Manufacturing Co.
501 North Sacramento Boulevard
Chicago, Illinois 60612

1.3 Operator

Lakewood Engineering & Manufacturing Co.
501 North Sacramento Boulevard
Chicago, Illinois 60612

Carl W. Krauss
773/722-4300

1.4 General Source Description

Lakewood Engineering & Manufacturing Company, is located at 501 North Sacramento Boulevard in Chicago, Illinois. Lakewood operates a fans, radiators, and tree stands manufacturing and coating source.

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2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollution Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through E), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27717
ATU	Allotment Trading Unit
BAT	Best Available Technology
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CO	Carbon Monoxide
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
ERMS	Emissions Reduction Market System
°F	Degrees Fahrenheit
ft	feet
ft ³	cubic foot
gal	gallon
hr	hour
HAP	Hazardous Air Pollutant
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
kg	kilogram
LAER	Lowest Achievable Emission Rate
lb	pound
m	meter
MACT	Maximum Achievable Control Technology
Mg	Megagram (metric tonne)
mmBtu	Million Btus
mo	month
MSDS	Material Safety Data Sheets
MW	Megawatt
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen Oxides
PM	Particulate Matter
ppm	parts per million
PSD	Prevention of Significant Deterioration
RMP	Risk Management Plan
SO ₂	Sulfur Dioxide
T	ton
T1	Title I - Identifies Title I conditions that have been carried over from an existing construction permit

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T1N	Title I New - Identifies Title I conditions that are being established in this permit
T1R	Title I Revised - Identifies Title I conditions that have been carried over from an existing construction permit and subsequently revised in this permit
TPY	Tons Per Year
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material
wt.	weight
yr	year

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

- 3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a) (1) and 201.211, as follows:

N/A

- 3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a) (2) or (a) (3), as follows:

Various presses to shape steel parts.

Various Semi-automatic welders.

Manual spot welding stations.

Case frame tack welders.

Iron Phosphate cleaning system.

Drying Oven - OV #2 - Dries parts from phosphate wash.

Labeling LA #1 - Gluing labels onto some parts.

7000 Oil Fill #1 - Radiators are filled with #2 mineral oil.

Packaging - PK #1 - Packing cartons are glued shut and stenciled with its destination.

Air compressors.

Injection molding machines.

Automated Powder Coating Booth.

- 3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a) (4) through (18), as follows:

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Printing operation (Pad Print - PP #1) with aggregate organic solvent usage that never exceeds 750 gallons per year from all printing lines at the source, including organic solvent from inks, diluents, fountain solutions, and cleaning materials [35 IAC 201.210(a)(14)].

Storage tank (mineral oil storage tank) of virgin or redefined distillate oil, hydrocarbon condensate from natural gas pipeline or storage systems, lubricating oil, or residual fuel oils [35 IAC 201.210(a)(11)].

- 3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b).

3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.2.2), the Permittee shall comply with the following requirements, as applicable:

- 3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, 218.182, or 219.182.
- 3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.
- 3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

3.3 Addition of Insignificant Activities

- 3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).

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- 3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.
- 3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

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4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
01	Gas Convection Oven (1.0 mmBtu/Hr)	8/1992	None
02	Coating Line #1 and Bake Oven (4.4 mmBtu/Hr)	3/1979	Filters
03	Burn-Off Oven (Pyrolysis Oven)	8/1995	Afterburner
04	Boiler #1	1940	None
05	Boiler #2	1940	None
06	Air Make-Up Unit #1	3/1979	None
07	Air Make-Up Unit #2	3/1979	None

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5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of VOM emissions.

5.1.2 This permit is issued based on the source being a major source of HAPs.

5.2 Applicable Regulations

5.2.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions) of this permit.

5.2.2 In addition, emission units at this source are subject to the following regulations of general applicability:

- a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.
- b. Emissions of smoke or other particulate matter from any emission unit shall not exceed 30% opacity, except that opacity of greater than 30% but less than 60% shall be allowed for periods aggregating 8 minutes in any 60 minute period provided that such more opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 m (1,000 ft) radius from the center point of any such emission unit owned and operated by the Permittee and provided further that such more opaque emissions permitted from each such unit shall be limited to 3 times per 24 hour period pursuant to 35 IAC 212.123(a) and (b).

5.2.3 Ozone Depleting Substances

The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

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- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

5.2.4 Risk Management Plan

Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in 40 CFR Part 68, then the owner or operator shall submit [40 CFR 68.215(a)(2)(i) and (ii)]:

- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
- b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan (RMP), as part of the annual compliance certification required by 40 CFR Part 70 or 71.

- 5.2.5 a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.
- b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or

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demonstrate compliance with all applicable requirements of any potentially applicable regulation which was promulgated after the date issued of this permit.

5.2.6 Episode Action Plan

- a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.
- b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.
- c. If a change occurs at the source which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.
- d. For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to:
 - i. Illinois EPA, Compliance Section; and
 - ii. For sources located in Cook County and outside of the city of Chicago: Cook County Department of Environmental Control; or
 - iii. For sources located within the city of Chicago: Chicago Department of Environmental Control.

5.3 Non-Applicability of Regulations of Concern

None

5.4 Source-Wide Operational and Production Limits and Work Practices

In addition to source-wide requirements in the Standard Permit Conditions in Section 9, the Permittee shall fulfill the following source-wide operational and production limitations and/or work practice requirements:

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units.

Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	104.25
Sulfur Dioxide (SO ₂)	0.09
Particulate Matter (PM)	5.96
Nitrogen Oxides (NO _x)	12.19
HAP, not included in VOM or Particulate Matter	-----
Total	122.49

5.5.2 Emissions of Hazardous Air Pollutants

This permit is issued based on the emissions of HAPs as listed in Section 112(b) of the Clean Air Act being equal to or exceeding 10 tons per year of a single HAP or 25 tons per year of any combination of such HAPs, so that this source is considered a major source for HAPs.

5.5.3 Other source-wide emission limitations are not set for this source pursuant to either the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, Illinois EPA rules for Major Stationary Sources Construction and Modification, 35 IAC Part 203, or Section 502(b)(10) of the CAA. However, there may be unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

5.6 General Recordkeeping Requirements

- 5.6.1 a. As a substitute for specific records of natural gas usage for affected ovens pursuant to Condition 7.1.9(b), the Permittee may maintain records of the following items for the source to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:
- i. Total natural gas usage at the source, in million ft³/year; and
 - ii. Annual NO_x emissions from the combustion of natural gas, in tons/year, based on the total natural gas usage at the source and applicable emission factors in Condition 7.4.12(b), with supporting calculations.
- b. The Permittee shall maintain records of the following items to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:
- Total annual emissions of the source, determined as the total of the emission data required to be kept by Section 7 of this permit.

5.6.2 Retention and Availability of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.
- b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the source with the requirements of this permit as follows, pursuant to Section 39.5(7)(f)(ii) of the Act:

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Annual emissions from the source in excess of the limits specified in Condition 5.5.1, within 30 days of such an occurrence. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

5.7.2 Annual Emission Report

The annual emission report required pursuant to Condition 9.7 shall contain emissions information for the previous year.

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Allowable Emissions

Compliance with the source-wide emission limits specified in Condition 5.5 shall be based on the recordkeeping and reporting requirements of Conditions 5.6 and 5.7, and Compliance Procedures in Section 7 (Unit Specific Conditions) of this permit.

6.0 EMISSION REDUCTION MARKET SYSTEM (ERMS)

6.1 Description of ERMS

The ERMS is a "cap and trade" market system for major stationary sources located in the Chicago ozone nonattainment area. It is designed to reduce VOM emissions from stationary sources to contribute to further reasonable progress toward attainment, as required by Section 182(c) of the Clean Air Act.

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Participating sources must hold "allotment trading units" (ATUs) for their actual seasonal VOM emissions. Each year participating sources are issued ATUs based on allotments set in the sources' CAAPP permits. These allotments are established from historical VOM emissions or "baseline emissions" lowered to provide the emission reduction from stationary sources required for further progress.

By December 31 of each year, the end of the reconciliation period following the seasonal allotment period, each source shall have sufficient ATUs in its transaction account to cover its actual VOM emissions during the preceding season. A transaction account's balance as of December 31 will include any valid ATU transfer agreements entered into as of December 31 of the given year, provided such agreements are promptly submitted to the Illinois EPA for entry into the transaction account database. The Illinois EPA will then retire ATUs in sources' transaction accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its transaction account, the Illinois EPA will issue a notice to the source to begin the process for Emissions Excursion Compensation.

In addition to receiving ATUs pursuant to their allotments, participating sources may also obtain ATUs from the market, including ATUs bought from other participating sources and general participants in the ERMS that hold ATUs (35 IAC 205.630) and ATUs issued by the Illinois EPA as a consequence of VOM emissions reductions from an Emissions Reduction Generator or an Intersector Transaction (35 IAC 205.500 and 35 IAC 205.510). During the reconciliation period, sources may also buy ATUs from a secondary reserve of ATUs managed by the Illinois EPA, the "Alternative Compliance Market Account" (ACMA) (35 IAC 205.710). Sources may also transfer or sell the ATUs that they hold to other sources or participants (35 IAC 205.630).

6.2 Applicability

This source is considered a "participating source" for purposes of the ERMS, 35 IAC Part 205.

6.3 Obligation to Hold Allotment Trading Units (ATUs)

- a. Pursuant to 35 IAC 205.150(c)(1) and 205.720, and as further addressed by condition 6.8, as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than its VOM emissions during the preceding seasonal allotment period (May 1 - September 30) not including VOM emissions from the following, or the source shall be subject to "emissions excursion compensation," as described in Condition 6.4.
 - i. VOM emissions from insignificant units and activities as identified in Section 3 of this permit, in accordance with 35 IAC 205.220;
 - ii. Excess VOM emissions associated with startup, malfunction or breakdown of an emission unit as authorized elsewhere in this permit, in accordance with 35 IAC 205.225;
 - iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3);
 - iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 IAC 205.750; and
 - v. VOM emissions from certain new and modified emission units as addressed by Section 6.7(b), if applicable, in accordance with 35 IAC 205.320(f).
- b. Notwithstanding the above condition, in accordance with 35 IAC 205.150(c)(2), if a source commences operation of a major modification, pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for such major modification or applicable provisions in Section 7.0 of this permit.

6.4 Market Transaction

- a. The source shall apply to the Illinois EPA for and obtain authorization for a Transaction Account prior to conducting any market transactions, as specified at 35 IAC 205.610(a).
- b. The Permittee shall promptly submit to the Illinois EPA any revisions to the information submitted for its Transaction Account, pursuant to 35 IAC 205.610(b).
- c. The source shall have at least one account officer designated for its Transaction Account, pursuant to 35 IAC 205.620(a).
- d. Any transfer of ATUs to or from the source from another source or general participant must be authorized by a qualified Account Officer designated by the source and approved by the Illinois EPA in accordance with 35 IAC 205.620 and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

6.5 Emission Excursion Compensation

Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 6.3, it shall provide emissions excursion compensation in accordance with the following:

- a. Upon receipt of an Excursion Compensation Notice issued by the Illinois EPA, the source shall purchase ATUs from the ACMA in the amount specified by notice, as follows:
 - i. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or
 - ii. If the source had an emissions excursion for the seasonal allotment period immediately before the period for the present emission excursion, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.
- b. If requested in accordance with paragraph (c) below or in the event that the ACMA balance is not adequate to cover the total emissions excursion amount, the Illinois EPA will deduct ATUs equivalent to the specified amount or any remaining portion thereof from the ATUs to be issued to the source for the next seasonal allotment period.

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- c. Pursuant to 35 IAC 205.720(c), within 15 days of receipt of an Excursion Compensation Notice, the owner or operator may request that ATUs equivalent to the amount specified be deducted from the source's next seasonal allotment by the Illinois EPA, rather than purchased from the ACMA.

6.6 Quantification of Seasonal VOM Emissions

- a. The methods and procedures specified in Section 5 and 7 of this permit for determining VOM emissions and compliance with VOM emission limitations shall be used for determining seasonal VOM emissions for purposes of the ERMS, with the following exceptions [35 IAC 205.315(b)]:

No exceptions

- b. The Permittee shall report emergency conditions at the source to the Illinois EPA in accordance with 35 IAC 205.750, if the Permittee intends to deduct VOM emissions in excess of the technology-based emission rates normally achieved that are attributable to the emergency from the source's seasonal VOM emissions for purposes of the ERMS. These reports shall include the information specified by 35 IAC 205.650(a), and shall be submitted in accordance with the following:
 - i. An initial emergency condition report within two days of the time when such excess emissions occurred due to the emergency; and
 - ii. A final emergency condition report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

6.7 Annual Account Reporting

- a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emission Report, seasonal VOM emission information to the Illinois EPA for the seasonal allotment period. This report shall include the following information [35 IAC 205.300]:
 - i. Actual seasonal emissions of VOM from the source;
 - ii. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations;

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- iii. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in Section 205.337 of this Subpart;
- iv. If a source has experienced an emergency, as provided in 35 IAC 205.750, the report shall reference the associated emergency conditions report that has been approved by the Agency;
- v. If a source's baseline emissions have been adjusted due to a variance, consent order or CAAPP permit compliance schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3); and
- vi. If a source is operating a new or modified emission unit for which three years of operational data are not yet available, as specified in 35 IAC 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.

- b. This report shall be submitted by October 31 of each year, for the preceding seasonal allotment period.

6.8 Allotment of ATUs to the Source

- a.
 - i. The allotment of ATUs to this source is 359 ATUs per seasonal allotment period.
 - ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 40.67 tons.
 - A. This determination includes the use of 1994 and 1995 as baseline seasons.
 - iii. The source's allotment reflects 88% of the baseline emissions (12% reduction) except for the VOM emissions from specific emission unit excluded from such reduction, pursuant to 35 IAC 205.405 including units complying with MACT or using BAT, as identified in Section 6.11 of this permit.

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- iv. ATUs will be issued to the source's Transaction Account by the Illinois EPA annually. These ATUs will be valid for the seasonal allotment period following issuance and, if not retired in this season, the next seasonal allotment period.
- v. Condition 6.3(a) becomes effective beginning in the seasonal allotment period following the initial issuance of ATUs by the Illinois EPA into the Transaction Account for the source.
- b. Contingent Allotments for New or Modified Emission Units

Not applicable.
- c. Notwithstanding the above, part or all of the above ATUs will not be issued to the source in circumstances as set forth in 35 IAC Part 205, including:
 - i. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630;
 - ii. Deduction of ATUs as a consequence of emission excursion compensation, in accordance with 35 IAC 205.720; and
 - iii. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

6.9 Recordkeeping for ERMS

The Permittee shall maintain copies of the following documents as its Compliance Master File for purposes of ERMS [35 IAC 205.700(a)]:

- a. Seasonal component of the Annual Emission Report;
- b. Information on actual VOM emissions, as specified in detail in Sections 5 and 7 of this permit and Condition 6.6(a); and
- c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

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6.10 Exclusions from Further Reductions

- a. VOM emissions from the following emission units, if satisfying subsection (a) (1), (a) (2), or (a) (3) prior to May 1, 1999, shall be excluded from the VOM emissions reductions requirements specified in IAC 205.400(c) and (e) as long as such emission units continue to satisfy subsection (a) (1), (a) (2), (a) (3) [35 IAC 205.405(a)]:

- i. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to the CAA;
- ii. Direct combustion emission units designed and used for comfort heating purposes, fuel combustion emission units and internal combustion engines; and
- iii. An emission unit for which a LAER demonstration has been approved by the Illinois EPA on or after November 15, 1990.

The source has demonstrated in their ERMS application and the Illinois EPA has determined that the following emission units qualifies for exclusion from further reductions because they meet the criteria as indicated above [35 IAC 205.400(a) and (c)]:

Boiler #1
Boiler #2
Air Make-Up Unit #1
Air Make-Up Unit #2

- b. VOM emissions from the emission units using BAT for controlling VOM emissions, prior to May 1, 1999, shall not be subject to the VOM emissions reductions requirements specified in IAC 205.400(c) or (e) as long as such emission unit continues to use such BAT [35 IAC 205.405(b)].

The source has demonstrated in their ERMS application and the Illinois EPA has determined that the following emission units qualifies from further reductions because these emission units use BAT for controlling VOM emissions as indicated above [35 IAC 205.400(b) and (c)]:

None

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit 01: Gas Convection Oven

7.1.1 Description

Radiator components are processed in the gas convection oven (OV #1) to dry out any water and lubricating oil deposited on the radiator housing during machining operation.

This gas convection oven was constructed in August, 1992 in Cook county which is a severe ozone non-attainment area.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
01	Gas Convection Oven (1.0 mmBtu/Hr)	None

7.1.3 Applicable Regulations

- a. An "affected gas convection oven" for the purpose of these unit specific conditions is an oven used to dry out parts. As of the "date issued" as shown on page 1 of this permit, the affected coating lines are identified in Condition 7.1.2.
- b. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb./hr) of organic material into the atmosphere from any emission unit [35 IAC 218.301].
- c. Each affected gas convection oven at the source is subject to 35 IAC 212.321(a), which requires that:
 - i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (see Attachment 2) [35 IAC 212.321(a)].

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- d. The affected gas convection oven is subject to 35 IAC 214, Subpart K, which provides that no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2,000 ppm [35 IAC 214.301].

7.1.4 Non-Applicability of Regulations of Concern

- a. An affected gas convection oven is not subject to the requirements of 35 IAC 218 Subpart TT: Other Emission Units, because potential to emit is less than 22.7 Mg (25 tons) per calendar year of VOM in aggregate, from emissions units, other than furnaces at glass container manufacturing sources and VOM leaks from components, that are [35 IAC 218.980(b)]:
 - i. Not regulated by Subpart B, E, F, H, Q, R, S, T, (excluding 35 IAC 218.486), V, X, Y, Z, or BB; or
 - ii. Not included in any of the following categories: synthetic organic chemical manufacturing industry (SOCMI) distillation, SOCMI reactors, wood furniture, plastic parts coating (business machines), plastic parts coating (other), offset lithography, industrial wastewater, autobody refinishing, SOCMI batch processing, volatile organic liquid storage tanks and clean-up solvents operations.
- b. This permit is issued based on the affected gas convection oven not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected gas convection oven does not use an add-on control device to achieve compliance with an emission limitation or standard.

7.1.5 Operational and Production Limits and Work Practices

None

7.1.6 Emission Limitations

There are no specific emission limitations for this unit, however, there are source-wide limitations in Condition 5.5 that include this unit.

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7.1.7 Testing Requirements

None

7.1.8 Monitoring Requirements

None

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected gas convection oven to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

- a. Usage of lubricating oil indicated by purchase records (gal/yr).
- b. Density of lubricating oil (lb/gal).
- c. Maximum usage in gal/hr of lubricating oil.
- d. MSDS of all lubricating oils.
- e. Record indicating that gas convection oven is exempt from the requirements of 35 IAC 218 Subpart TT.
- f. Record of annual fuel usage (10^6 ft³/yr).
- g. The annual NO_x, PM, SO₂, and VOM emissions from the affected gas convection oven, with supporting calculations.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviations of an affected gas convection oven with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- a. Emissions of NO_x, PM, SO₂, and VOM in excess of the limits specified in Condition 5.5.1 based on the current month's records plus the preceding 11 months within 30 days of such an occurrence.

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7.1.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical and operational change with respect to the affected gas convection oven operation without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

- a. Usage of any lubricating oil without exceeding the permitted emission of Condition 5.5.1 and without exceeding any limit of this permit.

7.1.12 Compliance Procedures

Compliance with the emission limits in Condition 5.5.1 shall be determined by the recordkeeping requirements in Condition 7.1.9 and the emission calculation methodology described below:

- a. Emissions from gas convection oven (lubricating oil usage):

$$\text{VOM Emissions (lb/yr)} = \text{Lubricating oil usage (gal/yr)} * \text{oil density (lb/gal)} * 78.4 \%$$

Where 78.4 % represents the percentage of total lubricating oil used in the gas convection oven.

- b. Maximum lubricating oil usage (lb/hr) and emission determination method of 7.1.12 shall be used to demonstrate compliance with 35 IAC 218.301.
- c. Emissions from fuel combustion in the gas convection oven shall be determined by the emission factors and formulas listed below:

<u>Pollutant</u>	<u>Emission Factor (lb/10⁶ ft³)</u>
CO	84.0
NO _x	100
PM	7.6
SO ₂	0.6
VOM	5.5

These are the emission factors for uncontrolled natural gas combustion in small boilers (<100 mmBtu/hr), Tables 1.4-1 and 1.4-2, AP-42, Volume I, Supplement D, March, 1998.

Emissions (lb) = Natural gas consumed multiplied by the appropriate emission factor

7.2 Unit 02: Coating Line #1

7.2.1 Description

Coating Line #1 is comprised of automatic spray booths followed by a dual set of manual touch-up spray booths, all with filter control, a bake oven, and associated clean-up operations.

The clean component parts are conveyed to the Coating Line #1. The parts pass through a total of four spray booths - two automated and two manual touch-up. Each pair is oriented such that the first booth paints one side and the other paints the opposite side. The automated booths provide the majority of the paint coverage, with the manual booths being used to reach the difficult areas. All the booths have dry filter material at the back to collect the over spray. There is a small spray booth which is occasionally used to test proposed new paints to determine their feasibility and performance.

Coating Line #1 also has a second mode of operation in which dry powder paints are used instead of the solvent-based coatings. When the powder coating is conducted, the two automated booths are not utilized and the powder is applied in either the automatic powder coating booth or the two manual booths.

Coating Line #1 was installed in March, 1979 and started operation in May, 1979.

7.2.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
02	Coating Line #1 and Bake Oven (4.4 mmBtu/Hr)	Filters

7.2.3 Applicable Regulations

- a. An "affected coating line" for the purpose of these unit specific conditions is a coating operation that includes a spray booth and drying oven which is used to apply coating to a metal substrate. As of the "date issued" as shown on page 1 of this permit, the affected coating lines are identified in Condition 7.2.2.

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- b. Each affected coating line at the source is subject to 35 IAC 212.321(a), which requires that:
 - i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (see Attachment 2) [35 IAC 212.321(a)].
- c. Each affected coating line at the source is subject to 35 IAC 218.204(j) (2) (B) baked extreme performance coating, which provides that:
 - i. No owner or operator of an affected coating line shall apply at any time any coating in which the VOM content exceeds the following emission limitations for the coating as applied to Miscellaneous Metal Parts and Products Coating. The following emission limitation is expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator:

<u>kg/liter</u>	<u>lbs/gallon</u>
0.40	3.3
 - ii. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composites.
- d. The bake oven for the affected coating line is subject to 35 IAC 214, Subpart K, which provides that no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2,000 ppm [35 IAC 214.301].

7.2.4 Non-Applicable Regulations of Regulations of Concern

- a. Each affected coating line is not subject to 35 IAC 218.301, Use of Organic Material, pursuant to 35 IAC 218.209, Exemption From General Rule on Use of Organic Material which excludes affected coating lines from this requirements.

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- b. This permit is issued based on the affected coating line not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected coating line does not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

7.2.5 Operational and Production Limits and Work Practices

- a. The line drying ovens shall only be operated with natural gas as the fuel.
- b. i. The Permittee shall operate, maintain, and replace the filters in a manner that assures compliance with the conditions of this section.
- ii. An adequate inventory of spare filters shall be maintained.

7.2.6 Emission Limitations

In addition to Condition 5.2.2 and the source-wide limitations in Condition 5.5, the affected coating line is subject to the following:

- a. Emissions and operation of the affected coating line shall not exceed the following limits:

<u>Material</u>	<u>Material Usage</u> <u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>Maximum</u> <u>VOM Content</u>	<u>VOM Emissions</u> <u>(T/Mo)</u>	<u>(T/Yr)</u>
Coating					
Material	8,550	51,272	3.3 lb VOM/gal	14.11	84.60
Cleanup					
Solvent & Thinner	733	4,397	100%	2.57	15.39
				Total:	99.99

These limits are based on maximum material usage, maximum VOM content, a maximum density of 7.0 lb/gal for cleanup solvents and thinners, and emissions are determined by material balance. VOM emissions from coating material usage shall be determined based on 100% of the VOM used being emitted. VOM emissions from cleanup solvents and thinners shall be

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calculated from the difference in cleanup solvents and thinners taken from inventory and reclaimed cleanup solvents and thinners sent to temporary storage for ultimate outside disposal.

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1N].

The above limitations are being established in this permit pursuant to Title I of the CAA, specifically 35 IAC 203, Major Stationary Sources Construction and Modification. The source has requested that the Illinois EPA establish emission limitations and other appropriate terms and conditions in this permit that limit the VOM emissions from the affected coating line below the levels that would trigger the applicability of these rules, consistent with the information provided in the CAAPP application [T1N].

7.2.7 Testing Requirements

Testing for VOM content of coatings and other materials shall be performed as follows [35 IAC 218.105(a), and Section 39.5(7)(b) of the Act]

- a. Upon reasonable request by the Illinois EPA, the VOM content of specific coatings and cleaning solvents used on each affected coating line shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 281.105(a).
 - i. The VOM content of representative coatings "as applied" on the affected coating line shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a).
 - ii. This testing may be performed by the supplier of a material provided that the supplier provides appropriate documentation for such testing to the Permittee and the Permittee's records pursuant to Condition 7.2.9(b) directly reflect the application of such material and separately account for any additions of solvent.

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7.2.8 Monitoring Requirements

The Permittee shall visually inspect the filters and check for air flow drop on a regular basis in order to ensure proper operation of the filters and the need for replacement.

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected coating line to demonstrate compliance with Conditions of this section, pursuant to Section 39.5(7)(b) of the Act:

- a.
 - i. The name and identification number of each coating as applied on the affected coating line.
 - ii. The usage of each coating, solvent, and any other material used containing VOM in units of gallons/month and gallons/year.
 - iii. The weight of VOM per volume of each coating (minus water and any compounds specifically exempted from the definition of VOM) as applied each day on the affected coating line.
 - iv. VOM content in weight percent for each material used containing VOM.
 - v. Density in pounds per gallon of each material used containing VOM.
 - vi. Emissions of VOM in tons/month and tons/year from each affected coating line including cleanup solvent and thinner.
 - vii. Cleanup solvent sent for reclamation.
- b. Records of the testing of VOM and HAP content (wt. %) of each coating and cleaning solvent as tested pursuant to the conditions of this section, which include the following [Section 39.5(7)(e) of the Act]:
 - i. Identification of material tested;
 - ii. Results of analysis;

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- iii. Documentation of analysis methodology; and
- iv. Person performing analysis.
- c. The operating schedule of the affected coating line.
- d. Results of filter inspections and dates of replacements made.

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviations of an affected coating line with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- a. The Permittee shall notify the Illinois EPA of any record showing violation of Condition 7.2.3(c) within 30 days of such an occurrence [35 IAC 218.211(d)(3)].
- b. Emissions of NO_x, PM, SO₂, and VOM in excess of the limits specified in Condition 5.5.1 or 7.2.6 based on the current month's records plus the preceding 11 months within 30 days of such an occurrence.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected coating lines without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

- a. Usage of coatings, thinners, or cleaning solvents at this source with various VOM contents provided that the materials are tested in accordance with the conditions of this section, the source wide emission limitations in Conditions 5.5.1 are not exceeded and the affected coating line remains in compliance.

7.2.12 Compliance Procedures

- a. Compliance with the particulate matter limitations in this section is assured and achieved by the proper operation and maintenance of the filters as required by this section and the work-practices inherent in operation of an affected coating line.
- b. Compliance with the VOM content limitations in Condition 7.2.3(c) shall be determined from the recordkeeping requirements in Condition 7.2.9 and by either testing as required by Condition 7.2.7 or by use of the following formulae:

$$\text{Coating VOM Content} = V \times D / [1 - W \times D],$$

Where:

V = Percent VOM in the coating (wt.%)

D = Overall coating density (lb/gal)

W = $\Sigma (w_i / d_i)$

Where:

w_i = Percent exempt compound i in the coating (wt.%)

d_i = Density of exempt compound i (lb/gal)

and the summation is applied over water and all exempt compounds in the coating.

- c. Compliance with the VOM emission limitations in Conditions 5.5.1 and 7.2.6 shall be determined from the recordkeeping and testing required by this section and the following equation:

VOM Emissions (lb) = Coating Usage (gal) * Coating Density (lb/gal) * VOM Content of Coating (wt.%) + Solvent/Thinner Usage (gal) * VOM Content of Solvent/Thinner (wt.%) * Solvent/Thinner Density (lb/gal).

7.3 Unit 03: Burn-off Oven (Pyrolysis Oven)

7.3.1 Description

The conveyor part hooks and any rejected parts are processed in the automated burn-off oven (OV #4) which drives off the VOM in the paint and ashes the pigments. The VOM which is driven off is destroyed in the afterburner which is an integral part of this burn-off oven. The cleaned part hooks are returned to the process line for reuse.

This burn-off oven was constructed in August, 1995 in Cook county which is a severe ozone non-attainment area.

7.3.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
03	Burn-Off Oven (Pyrolysis Oven)	Afterburner

7.3.3 Applicable Regulations

- a. An "affected burn-off oven" for the purpose of these unit specific conditions is an oven used to drive off VOM from coated parts. As of the "date issued" as shown on page 1 of this permit, the affected coating lines are identified in Condition 7.3.2.
- b. Each affected burn-off oven at the source is subject to 35 IAC 212.321(a), which requires that:
 - i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (see Attachment 2) [35 IAC 212.321(a)].
- c. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb./hr) of organic material into the atmosphere from any emission unit [35 IAC 218.301].

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- d. The affected burn-off oven is subject to 35 IAC 214, Subpart K, which provides that no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2,000 ppm [35 IAC 214.301].

7.3.4 Non-Applicability of Regulations of Concern

This permit is issued based on the affected burn-off oven not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected burn-off oven does not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

7.3.5 Operational and Production Limits and Work Practices

- a. Material insulated with polyvinyl chloride or asbestos, or scrap containing the fuming metals tin, zinc, or lead shall not be charged to the affected burn-off oven.
- b. The afterburner for the affected burn-off oven shall be heated to an operating temperature of at least 1400°F before charging and this temperature shall be maintained during operation.
- c. Natural gas shall be the only fuel fired in the burn-off oven.

7.3.6 Emission Limitations

In addition to Condition 5.2.2 and the source-wide emission limitations in Condition 5.5, the affected burn-off oven is subject to the following:

- a. Emissions from fuel combustion in the affected burn-off oven shall not exceed the following limits:

Operating Hours (Hr/Yr)	Firing Rate (mmBtu/Hr)	PM Emissions		NO _x Emissions	
		(Lb/Hr)	(T/Yr)	(Lb/Hr)	(T/Yr)
2,080	1.47	0.55	0.57	0.15	0.16

These limits are based on the maximum firing rate, standard AP-42 emission factors, maximum hours of operation, and allowable emission limits.

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Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1].

The above limitations were established in Construction Permit 95060187, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

7.3.7 Testing Requirements

None

7.3.8 Monitoring Requirements

The affected burn-off oven shall be equipped with an afterburner temperature indicator.

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected burn-off oven to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

- a. Record of operating temperature of the afterburner in °F.
- b. Record of maximum process weight rate (lb/hr).
- c. Record of fuel usage (10^6 ft³/mo).
- d. Record of operating hours (hr/mo).
- e. The annual NO_x, PM, SO₂, and VOM emissions from the affected burn-off oven, with supporting calculations.

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviations of an affected burn-off oven with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- a. Emissions of NO_x, PM, SO₂, and VOM in excess of the limits specified in Condition 5.5.1 or 7.3.6 based on the current month's records plus the preceding 11 months within 30 days of such an occurrence.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.3.12 Compliance Procedures

- a. Recordkeeping requirements and monitoring requirements of this section shall be used to determine compliance with the operational limits in Condition 7.3.5(b).
- b. Compliance with the emission limits in Conditions 5.5.1 and 7.3.6 shall be based on the recordkeeping requirements in Condition 7.3.9 and the emission factors and formulas listed below:
 - i. Fuel combustion emissions:

<u>Pollutant</u>	<u>Emission Factor</u> <u>(lb/10⁶ ft³)</u>
CO	84.0
NO _x	100
PM	7.6
SO ₂	0.6
VOM	5.5

These are the emission factors for uncontrolled natural gas combustion in small boilers (<100 mmBtu/hr), Tables 1.4-1 and 1.4-2, AP-42, Volume I, Supplement D, March, 1998.

Emissions (lb) = Natural gas consumed
multiplied by the appropriate
emission factor

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ii. Process emissions:

<u>Pollutant</u>	Emission Factor <u>(Lb/Hr)</u>
PM	0.027

This is an emission factor based on
manufacturer's test data.

Emissions (lb) = Operating hours * 0.027 lb/hr

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7.4 Units 04 and 07: Boiler #1 and #2, and Air Make-Up Unit #1 and #2

7.4.1 Description

Boiler #1 is a natural gas fired boiler and the primary source of heat for the plant. Boiler # 2 is used only when Boiler # 1 is shut down for maintenance or in rare cases when an extremely long period of cold weather occurs and extra heating capacity is required to maintain a comfortable temperature in the plant.

Air Make-up units # 1 and # 2 were installed to provide warmed air to the coating line area to make up for the high rate of exhaust air removed. The units are currently disconnected but may be used in the future.

7.4.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Rated Heat Input
04	Boiler #1	14.75 mmBtu/hr
05	Boiler #2	14.75 mmBtu/hr
06	Air Make-Up Unit #1	3.6 mmBtu/hr
07	Air Make-Up Unit #2	3.6 mmBtu/hr

7.4.3 Applicable Regulations

- a. The "affected fuel combustion emission units" for the purpose of these unit-specific conditions, are boilers and air make-up units used for heating or providing heated air. As of the "date issued" as shown on page 1 of this permit, the affected fuel combustion emission units are identified in Condition 7.4.2.
- b. Pursuant to 35 IAC 216.121, no person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission source with actual heat input greater than 2.9 MW (10 mmBtu/hr) to exceed 200 ppm, corrected to 50 percent excess air. Boiler # 1 and # 2 are subject to 35 IAC 216.121

7.4.4 Non-Applicability of Regulations of Concern

- a. Air make-up units # 1 and # 2 are not subject to the New Source Performance Standard for Small-Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc, because each unit has a maximum design heat input capacity of less than 2.9 MW (10 mmBtu/hr).

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- b. Air make-up units #1 and #2 are not subject to 35 IAC 216.121, Emissions of Carbon Monoxide from Fuel Combustion Emission Units, because the actual heat input of each unit is less than 2.9 MW (10 mmBtu/hr).
- c. The affected fuel combustion emission units are not subject to 35 IAC 217.141, emissions of Nitrogen Oxides from Existing Fuel Combustion Emission Sources in Major Metropolitan Areas, because the actual heat input of each unit is less than 73.2 MW (250 mmBtu/hr).
- d. Pursuant to 35 IAC 218.303, the affected fuel combustion emission units are not subject to 35 IAC 218.301, use of organic material.
- e. This permit is issued based on the affected fuel combustion emission units not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected fuel combustion emission units do not use an add-on control device to achieve compliance with an emission limitation or standard.

7.4.5 Operational and Production Limits and Work Practices

The affected fuel combustion emission units shall only be operated with natural gas as the fuel.

7.4.6 Emission Limitations

There are no specific emission limitations for this unit, however, there are source-wide limitations in Condition 5.5 that include this unit.

7.4.7 Testing Requirements

None

7.4.8 Monitoring Requirements

None

7.4.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected fuel combustion emission unit to demonstrate compliance with Condition 5.5.1 pursuant to Section 39.5(7)(b) of the Act:

- a. Records of the annual fuel usage; and

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- b. Records of annual aggregate NO_x, PM, CO, SO₂, and VOM emissions based on fuel consumption and the applicable emission factors, with supporting calculations.

7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviations of an affected fuel combustion emission unit with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- a. Emissions of NO_x, PM, SO₂, and VOM in excess of the limits specified in Condition 5.5.1 based on the current month's records plus the preceding 11 months within 30 days of such an occurrence.

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.4.12 Compliance Procedures

Compliance with the emission limits in Condition 5.5.1 shall be based on the recordkeeping requirements in Condition 7.4.9 and the emission factors and formulas listed below:

<u>Pollutant</u>	<u>Emission Factor</u> <u>(lb/10⁶ ft³)</u>
CO	84.0
NO _x	100
PM	7.6
SO ₂	0.6
VOM	5.5

These are the emission factors for uncontrolled natural gas combustion in small boilers (<100 mmBtu/hr), Tables 1.4-1 and 1.4-2, AP-42, Volume I, Supplement D, March, 1998.

Emissions (lb) = natural gas consumed multiplied by the appropriate emission factor

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source, and this determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after _____ (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

8.3 Emissions Trading Program

No permit revision shall be required for increases in emissions allowed under any approved economic incentive, marketable permits, emissions trading, or other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement. (Section 39.5(7)(o)(vii) of the Act)

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes that contravene express permit terms without applying for or obtaining an amendment to this permit, provided that [Section 39.5(12)(a)(i) of the Act]:

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- a. The changes do not violate applicable requirements;
- b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements;
- c. The changes do not constitute a modification under Title I of the CAA;
- d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and
- e. The Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change. This notice shall:
 - i. Describe the physical or operational change;
 - ii. Identify the schedule for implementing the physical or operational change;
 - iii. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
 - iv. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
 - v. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other process, emissions, or composition parameters shall be conducted using standard test methods. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

If monitoring is required by any applicable requirements or conditions of this permit, a report summarizing the required monitoring results, as specified in the conditions of this permit, shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

<u>Monitoring Period</u>	<u>Report Due Date</u>
January - June	September 1
July - December	March 1

All instances of deviations from permit requirements must be clearly identified in such reports. All such reports shall be certified in accordance with Condition 9.9.

8.6.2 Test Notifications

Unless otherwise specified elsewhere in this permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior to the testing pursuant to Section 39.5(7)(a) of the Act. The notification shall include at a minimum:

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;
- d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;
- e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;

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- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and
- g. Any proposed use of an alternative test method, with detailed justification.

8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum:

- a. The name and identification of the affected unit(s);
- b. The date and time of the sampling or measurements;
- c. The date any analyses were performed;
- d. The name of the company that performed the tests and/or analyses;
- e. The test and analytical methodologies used;
- f. The results of the tests including raw data, and/or analyses including sample calculations;
- g. The operating conditions at the time of the sampling or measurements; and
- h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:
 - i. Illinois EPA - Air Compliance Section

Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (MC 40)
P.O. Box 19276
Springfield, Illinois 62794-9276

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ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

iii. Illinois EPA - Air Permit Section

Illinois Environmental Protection Agency
Divisions of Air Pollution Control
Permit Section (MC 11)
P.O. Box 19506
Springfield, Illinois 62794-9506

iv. USEPA Region 5 - Air Branch

USEPA (AE - 17J)
Air & Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604

- b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

8.7 Obligation to Comply with Title I Requirements

Any term, condition, or requirement identified in this permit by T1, T1R, or T1N is established or revised pursuant to 35 IAC Part 203 or 40 CFR 52.21 ("Title I provisions") and incorporated into this permit pursuant to both Section 39.5 and Title I provisions. Notwithstanding the expiration date on the first page of this permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

- 9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in this permit and as allowed by law and rule. [Section 39.5(7)(j)(iv) of the Act]
- 9.1.2 In particular, this permit does not alter or affect the following:
- a. The provisions of Section 303 (emergency powers) of the Clean Air Act, including USEPA's authority under that Section;
 - b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - c. The applicable requirements of the acid rain program consistent with Section 408(a) of the Clean Air Act; and
 - d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the Clean Air Act.
- 9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the Clean Air Act and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application. [Section 39.5(7)(o)(i) of the Act]

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The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.

9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless such malfunction or breakdown is allowed by a permit condition. [Section 39.5(6)(c) of the Act]

9.2.4 Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Environmental Protection Act or regulations promulgated thereunder.

9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto. [Section 39.5(7)(o)(vi) of the Act] The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois 62794-9276.

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(a) and (p)(ii) of the Act and 415 ILCS 5/4]:

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- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- d. Sample or monitor any substances or parameters at any location:
 - i. At reasonable times, for the purposes of assuring permit compliance; or
 - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants authorized by this permit; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

9.4 Obligation to Comply With Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

9.5 Liability

9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

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9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the sources.

9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the source.

9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege. [Section 39.5(7)(o)(iv) of the Act]

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes. [Section 39.5(12)(b) of the Act]

9.6.3 Retention of Records

- a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support

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information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. [Section 39.5(7)(e)(ii) of the Act]

- b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Compliance Section no later than May 1 of the following year, as required by 35 IAC Part 254.

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit annual compliance certifications. The compliance certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Section, Air Regional Field Office, and USEPA Region 5 - Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

- a. The certifications shall include descriptions on means to monitor the compliance of the source including emissions limitations, standards, and work practices in accordance with applicable requirements and permit conditions. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.
- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as an attachment to this permit.

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [Section 39.5(7)(o)(ii) of the Act]

9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:
 - i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;
 - ii. The permitted source was at the time being properly operated;
 - iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and
 - iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.

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- b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

This permit may be modified, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification, revocation, and reissuance, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [Section 39.5(7)(o)(iii) of the Act]

9.12.2 Reopening and Revision

This permit must be reopened and revised if any of the following occur [Section 39.5(15)(a) of the Act]:

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;
- c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and

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- d. The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.

9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under Section 39.5(15)(b) of the Act.

9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality. [Section 39.5(7)(o)(v) of the Act]

9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force. [Section 39.5(7)(i) of the Act]

9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions. [Section 39.5(5)(l), (n) and (o) of the Act]

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10.0 ATTACHMENTS

10.1 Attachment 1 - Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

10.2 Attachment 2 - Particulate Matter Emissions from Process Emission Units

- a. Interpolated and extrapolated values of the data in subsection (c) of 35 IAC 212.321 shall be determined by using the following equation:

$$E = A (P)^B$$

Where:

P = Process Weight Rate

E = Allowable Emission Rate

- i. For process weight rates up to 408 MG/hr (450 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534

- ii. For process weight rates greater than or equal to 408 MG/hr (450 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	11.42	24.8
B	0.16	0.16

[35 IAC 212.321]

- b. Limits for Process Emission Units For Which Construction of Modification Commenced On or After April 14, 1972 [35 IAC 212.321(c)]

Metric		English	
P	E	P	E
Mg/hr	kg/hr	Ton/hr	lbs/hr
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77
0.2	0.42	0.20	1.10
0.3	0.64	0.30	1.35
0.4	0.74	0.40	1.58
0.5	0.84	0.50	1.75

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Metric		English	
P	E	P	E
Mg/hr	kg/hr	Ton/hr	lbs/hr
0.7	1.00	0.75	2.40
0.9	1.15	1.00	2.60
1.8	1.66	2.00	3.70
2.7	2.1	3.00	4.60
3.6	2.4	4.00	5.35
4.5	2.7	5.00	6.00
9.0	3.9	10.00	8.70
13.0	4.8	15.00	10.80
18.0	5.7	20.00	12.50
23.0	6.5	25.00	14.00
27.0	7.1	30.00	15.60
32.0	7.7	35.00	17.00
36.0	8.2	40.00	18.20
41.0	8.8	45.00	19.20
45.0	9.3	50.00	20.50
90.0	13.4	100.00	29.50
140.0	17.0	150.00	37.00
180.0	19.4	200.00	43.00
230.0	22.0	250.00	48.50
270.0	24.0	300.00	53.00
320.0	26.0	350.00	58.00
360.0	28.0	400.00	62.00
408.0	30.1	450.00	66.00
454.0	30.4	500.00	67.00

Where:

P = Process weight rate in Mg/hr or Ton/hr, and

E = Allowable emission rate in kg/hr or lbs/hr.

10.3 Attachment 3 - Guidance on Revising This Permit

The Permittee must submit an application to the Illinois EPA using the appropriate revision classification in accordance with Sections 39.5(13) and (14) of the Act and 35 IAC 270.302. Specifically, there are currently three classifications for revisions to a CAAPP permit. These are:

1. Administrative Permit Amendment;
2. Minor Permit Modification; and
3. Significant Permit Modification.

The Permittee must determine, request, and submit the necessary information to allow the Illinois EPA to use the appropriate procedure to revise the CAAPP permit. A brief explanation of each of these classifications follows.

1. Administrative Permit Amendment
 - Corrects typographical errors;
 - Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;
 - Requires more frequent monitoring or reporting by the Permittee;
 - Allows for a change in ownership or operational control of the source where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittees has been submitted to the Illinois EPA. This shall be handled by completing form 272-CAAPP, REQUEST FOR OWNERSHIP CHANGE FOR CAAPP PERMIT; or
 - Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits.

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2. Minor Permit Modification

- Do not violate any applicable requirement;
- Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;
- Do not require a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;
- Do not seek to establish or change a permit term or condition for which there is no corresponding underlying requirement and which avoids an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
 - A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the CAA; and
 - An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA.
- Are not modifications under any provision of Title I of the CAA;
- Are not required to be processed as a significant permit modification; and
- Modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches.

An application for a minor permit modification shall include the following:

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
- The source's suggested draft permit/conditions;

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Lakewood Engineering and Manufacturing Co.

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- Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
- Information as contained on form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT for the Illinois EPA to use to notify USEPA and affected States.

3. Significant Permit Modification

- Applications that do not qualify as either minor permit modifications or as administrative permit amendments;
- Applications requesting a significant change in existing monitoring permit terms or conditions;
- Applications requesting a relaxation of reporting or recordkeeping requirements; and
- Cases in which, in the judgment of the Illinois EPA, action on an application for modification would require decisions to be made on technically complex issues.

An application for a significant permit modification shall include the following:

- A detailed description of the proposed change(s), including all physical changes to equipment, changes in the method of operation, changes in emissions of each pollutant, and any new applicable requirements which will apply as a result of the proposed change. Note that the Permittee need only submit revised forms for equipment and operations that will be modified.

The Illinois EPA requires the information on the following appropriate forms to be submitted in accordance with the proper classification:

- Form 273-CAAPP, REQUEST FOR ADMINISTRATIVE PERMIT AMENDMENT FOR CAAPP PERMIT; or
- Form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT; or

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- Form 200-CAAPP, APPLICATION FOR CAAPP PERMIT (for significant modification).

Application forms can be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms>.

Note that the request to revise the permit must be certified for truth, accuracy, and completeness by a responsible official.

Note that failure to submit the required information may require the Illinois EPA to deny the application. The Illinois EPA reserves the right to require that additional information be submitted as needed to evaluate or take final action on applications pursuant to Section 39.5(5)(g) of the Act and 35 IAC 270.305.



Illinois Environmental Protection Agency
Division Of Air Pollution Control -- Permit Section
P.O. Box 19506
Springfield, Illinois 62794-9506

Application For Construction Permit (For CAAPP Sources Only)	For Illinois EPA use only
	I.D. number:
	Permit number:
	Date received:

This form is to be used by CAAPP sources to supply information necessary to obtain a construction permit. Please attach other necessary information and completed CAAPP forms regarding this construction/modification project.

Source Information		
1. Source name:		
2. Source street address:		
3. City:	4. Zip code:	
5. Is the source located within city limits? <input type="checkbox"/> Yes <input type="checkbox"/> No		
6. Township name:	7. County:	8. I.D. number:

Owner Information		
9. Name:		
10. Address:		
11. City:	12. State:	13. Zip code:

Operator Information (if different from owner)		
14. Name		
15. Address:		
16. City:	17. State:	18. Zip code:

Applicant Information	
19. Who is the applicant? <input type="checkbox"/> Owner <input type="checkbox"/> Operator	20. All correspondence to: (check one) <input type="checkbox"/> Owner <input type="checkbox"/> Operator <input type="checkbox"/> Source
21. Attention name and/or title for written correspondence:	
22. Technical contact person for application:	23. Contact person's telephone number:

This Agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 et seq. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.

Summary Of Application Contents	
24.	Does the application address whether the proposed project would constitute a new major source or major modification under each of the following programs: a) Non-attainment New Source Review – 35 IAC Part 203; b) Prevention of Significant Deterioration (PSD) – 40 CFR 52.21; c) Hazardous Air Pollutants: Regulations Governing Constructed or Reconstructed Major Sources – 40 CFR Part 63?
	<input type="checkbox"/> Yes <input type="checkbox"/> No
25.	Does the application identify and address all applicable emissions standards, including those found in the following: a) Board Emission Standards – 35 IAC Chapter I, Subtitle B; b) Federal New Source Performance Standards – 40 CFR Part 60; c) Federal Standards for Hazardous Air Pollutants – 40 CFR Parts 61 and 63?
	<input type="checkbox"/> Yes <input type="checkbox"/> No
26.	Does the application include a process flow diagram(s) showing all emission units and control equipment, and their relationship, for which a permit is being sought?
	<input type="checkbox"/> Yes <input type="checkbox"/> No
27.	Does the application include a complete process description for the emission units and control equipment for which a permit is being sought?
	<input type="checkbox"/> Yes <input type="checkbox"/> No
28.	Does the application include the information as contained in completed CAAPP forms for all appropriate emission units and air pollution control equipment, listing all applicable requirements and proposed exemptions from otherwise applicable requirements, and identifying and describing any outstanding legal actions by either the USEPA or the Illinois EPA? Note: The use of "APC" application forms is not appropriate for applications for CAAPP sources. CAAPP forms should be used to supply information.
	<input type="checkbox"/> Yes <input type="checkbox"/> No
29.	If the application contains TRADE SECRET information, has such information been properly marked and claimed, and have two separate copies of the application suitable for public inspection and notice been submitted, in accordance with applicable rules and regulations?
	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable, No TRADE SECRET information in this application

Note 1: Answering "No" to any of the above may result in the application being deemed incomplete.

Signature Block	
This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.	
30. I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete. Authorized Signature:	
BY:	
_____	_____
AUTHORIZED SIGNATURE	TITLE OF SIGNATORY
_____	_____/_____/_____
TYPED OR PRINTED NAME OF SIGNATORY	DATE

Note 2: An operating permit for the construction/modification permitted in a construction permit must be obtained by applying for the appropriate revision to the source's CAAPP permit, if necessary.

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10.5 Attachment 5 - Guidance on Renewing This Permit

Timeliness - Pursuant to Section 39.5(5)(n) of the Act and 35 IAC 270.301(d), a source must submit to the Illinois EPA a complete CAAPP application for the renewal of a CAAPP permit not later than 9 months before the date of permit expiration of the existing CAAPP permit in order for the submittal to be deemed timely. Note that the Illinois EPA typically sends out renewal notices approximately 18 months prior to the expiration of the CAAPP permit.

The CAAPP application must provide all of the following information in order for the renewal CAAPP application to be deemed complete by the Illinois EPA:

1. A completed renewal application form 200-CAAPP, APPLICATION FOR CAAPP PERMIT.
2. A completed compliance plan form 293-CAAPP, COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE FOR CAAPP PERMIT.
3. A completed compliance certification form 296-CAAPP, COMPLIANCE CERTIFICATION, signed by the responsible official.
4. Any applicable requirements that became effective during the term of the permit and that were not included in the permit as a reopening or permit revision.
5. If this is the first time this permit is being renewed and this source has not yet addressed CAM, the application should contain the information on form 464-CAAPP, COMPLIANCE ASSURANCE MONITORING (CAM) PLAN.
6. Information addressing any outstanding transfer agreement pursuant to the ERMS.
7. a. If operations of an emission unit or group of emission units remain unchanged and are accurately depicted in previous submittals, the application may contain a letter signed by a responsible official that requests incorporation by reference of existing information previously submitted and on file with the Illinois EPA. This letter must also include a statement that information incorporated by reference is also being certified for truth and accuracy by the responsible official's signing of the form 200-CAAPP, APPLICATION FOR CAAPP PERMIT and the form 296-CAAPP, COMPLIANCE CERTIFICATION. The boxes should be marked yes on form 200-CAAPP, APPLICATION FOR CAAPP PERMIT, as existing information is being incorporated by reference.

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January 15, 2004

- b. If portions of current operations are not as described in previous submittals, then in addition to the information above for operations that remain unchanged, the application must contain the necessary information on all changes, e.g., discussion of changes, new or revised CAAPP forms, and a revised fee form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT, if necessary.
8. Information about all off-permit changes that were not prohibited or addressed by the permit to occur without a permit revision and the information must be sufficient to identify all applicable requirements, including monitoring, recordkeeping, and reporting requirements, for such changes.
9. Information about all changes made under 40 CFR 70.4(b)(12)(i) and (ii) that require a 7-day notification prior to the change without requiring a permit revision.

The Illinois EPA will review all applications for completeness and timeliness. If the renewal application is deemed both timely and complete, the source shall continue to operate in accordance with the terms and conditions of its CAAPP permit until final action is taken on the renewal application.

Notwithstanding the completeness determination, the Illinois EPA may request additional information necessary to evaluate or take final action on the CAAPP renewal application. If such additional information affects your allowable emission limits, a revised form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT must be submitted with the requested information. The failure to submit to the Illinois EPA the requested information within the time frame specified by the Illinois EPA, may force the Illinois EPA to deny your CAAPP renewal application pursuant to Section 39.5 of the Act.

Application forms may be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms.html>.

If you have any questions regarding this matter, please contact a permit analyst at 217/782-2113.

Mail renewal applications to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)
P.O. Box 19506
Springfield, Illinois 62794-9506

I. INTRODUCTION

This source has applied for a renewal Clean Air Act Permit Program (CAAPP) operating permit for its existing operation. The CAAPP is the program established in Illinois for the operating permits for significant stationary sources required by the federal Clean Air Act, as amended in 1990. The conditions in a CAAPP permit are enforceable by both the Illinois Environmental Protection Agency (Illinois EPA) and the USEPA.

Lakewood Engineering & Manufacturing Co, is located at 501 North Sacramento Boulevard in Chicago, Illinois. Lakewood operates a fans, radiators, and tree stands manufacturing and coating source.

II. EMISSION UNITS

Significant emission units at this source are as follows:

Emission Unit	Description	Date Constructed	Emission Control Equipment
01	Gas Convection Oven (1.0 mmBtu/Hr)	8/1992	None
02	Coating Line #1 and Bake Oven (4.4 mmBtu/Hr)	3/1979	Filters
03	Burn-Off Oven (Pyrolysis Oven)	8/1995	Afterburner
04	Boiler #1	1940	None
05	Boiler #2	1940	None
06	Air Make-Up Unit #1	3/1979	None
07	Air Make-Up Unit #2	3/1979	None

III. EMISSIONS

This source is required to have a CAAPP permit since it is a major source of emissions. The proposed permit limits the maximum annual emissions from significant emission units at the source. Insignificant activities at this source are not accounted for in the source limit.

For purposes of fees, the source is allowed the following emissions:

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	104.25
Sulfur Dioxide (SO ₂)	0.09
Particulate Matter (PM)	5.96
Nitrogen Oxides (NO _x)	12.19
HAP, not included in VOM or Particulate Matter	-----
Total	122.49

IV. APPLICABLE EMISSION STANDARDS

All emission sources in Illinois must comply with the Illinois Pollution Control Board's emission standards. The Board's emission standards represent the basic requirements for sources in Illinois.

All emission sources in Illinois must comply with the federal New Source Performance Standards (NSPS). The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement.

All emission sources in Illinois must comply with the federal National Emission Standards for Hazardous Air Pollutants (NESHAP). The Illinois EPA is administering NESHAP in Illinois on behalf of the United States EPA under a delegation agreement.

V. PROPOSED PERMIT

A CAAPP permit contains conditions listing the applicable state and federal air pollution control regulations that apply to a source. The permit conditions also establish emission limits and appropriate compliance procedures. The appropriate compliance procedures may include inspections, work practices, monitoring, record keeping, and reporting to show compliance with these requirements. The Permittee must carry out these procedures on an on-going basis to demonstrate that the source is operating in accordance with the requirements of the permit.

A combined Title I/CAAPP permit contains terms and conditions established by the Illinois EPA pursuant to authority found in Title I provisions. Notwithstanding the expiration date on the first page of the permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

Because this source is located in the Chicago ozone nonattainment area and emits volatile organic material, the permit includes conditions to implement the Emission Reduction Market System (ERMS). The ERMS is a market-based program designed to reduce emissions from stationary sources to contribute to further reasonable progress toward attainment, as further described in section 6 of the permit. The permit contains the Illinois EPA's determination of the source's baseline emissions and allotment of trading units under the ERMS.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that this source's permit application meets the standards for issuance of a CAAPP permit. The Illinois EPA is therefore proposing to issue a CAAPP permit, subject to the conditions proposed in the draft permit.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 Ill. Adm. Code Part 166.

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